

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

JEREMY FARRIS	*	CIVIL ACTION NO. 6:19-cv-108
	*	
VERSUS	*	JUDGE ROBERT R. SUMMERHAYS
	*	
BRIAN DANA JEFFERSON, MICHAEL	*	MAGISTRATE JUDGE PATRICK J.
BISHOP, AND NATIONAL LIABILITY	*	HANNA
AND FIRE INSURANCE COMPANY	*	
	*	JURY TRIAL DEMANDED

MOTION IN LIMINE TO LIMIT TESTIMONY OF
PLAINTIFF'S ECONOMIST, RANDOLPH RICE

NOW INTO COURT come Defendants, Brian Dana Jefferson, Michael Bishop, and National Liability & Fire Insurance Company, through undersigned counsel, and move this Court for an Order:

- 1) limiting the testimony of Randolph Rice, Ph.D., precluding him from offering any testimony and/or calculations based on the qualifying age for Social Security benefits; and
- 2) limiting the testimony of Randolph Rice, Ph.D., precluding him from offering any testimony and/or calculations based on an assumption that the Plaintiff cannot return to work.

The basis for this motion is set forth in the attached memorandum in support which is incorporated herein via reference. Also attached and incorporated into this motion via reference is the following exhibit:

Exhibit A: Expert Report of Randolph Rice, Ph.D, dated March 19, 2020.

WHEREFORE, Defendants pray that this Court GRANT their Motion in Limine, and issue an Order excluding and limiting the testimony outlined above.

Respectfully submitted,

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By: s/ Franklin "Drew" Hoffmann

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